

Message

From: Hamilton, Scott [hamilton.scott@epa.gov]
Sent: 3/6/2017 9:22:19 PM
To: Compher, Michael [compher.michael@epa.gov]
Subject: RE: Agenda items for next weeks QA Call

I made some changes. Feel free to accept them or not. Just my \$0.02.

I think our message is that we agree with the handbook and people shouldn't invalidate based solely on QC check results. And we will ensure that is happening.

Scott Hamilton
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From: Compher, Michael
Sent: Monday, March 06, 2017 2:43 PM
To: Hamilton, Scott <hamilton.scott@epa.gov>
Subject: RE: Agenda items for next weeks QA Call

Scott – This is my proposed message to OAQPS. I'll attached the marked up draft with your and my revisions. Let me know if this draft is okay.

Mike and Lew,

We have had several discussions ~~on this~~ within R5 and look forward to the QA call ~~will articulate our Region's position on~~ Wednesday. We agree with the language in the QA Handbook. However, we want to emphasize ~~It is largely consistent with your draft, but more heavily relies on~~ the "unless there are compelling reasons and justification for not doing so" language ~~in the handbook~~. We agree that there should be consistency in the reporting of data and QC checks (e.g. invalid data from failed QC check should not have the QC check reported). See our suggested additional language to your draft memo, attached. We want to dispel any notion that it is okay to invalidate data based on the results of a QC check alone.

That being said, we are developing a strategy within R5 to ensure that data are not being invalidated solely because a QC check failed. We want to be sure that monitoring organizations are conducting an investigation as to why (and when) the failure occurred and more importantly we want a more proactive approach in place for examining QC check results for drift and corrective action. ~~the converse situation (a wholesale approach of invalidating the check and associated data without assessment, root cause analysis, or corrective action) is not occurring as well.~~ We want reporting organizations to (1) develop and implement action levels before reaching the point of exceeding 7% ~~where there are advance signals that this is approaching~~ (2) investigate and document the causes and follow-up actions when +/- 7% is reached, and (3) include applicable language in QAPPs. ~~about corrective actions, documentation, and data reporting after failure of a check (or other critical criteria).~~

We are considering identifying a couple examples for each State where they retained the ozone data and the check exceeding +/-7% ~~and left the check and associated~~, as well as a few examples of where they invalidated ~~a period of ambient ozone data and the QC check exceeded +/-7%. where we think there was probably a failed check that was not reported (inferred from large span of time between two successful checks), and~~ We want to have the States describe their rationale and documentation for each example so we can assess their practice and determine if further assistance is needed to help them implement a best practice. ~~We think this will provide us the best assessment of current practices~~

and each State's understanding of the EPA's guidance and policies on critical criteria, invalidation, and data reporting. (WE MAY WANT TO JUST TALK THOROUGH THE EXAMPLES WITH THE STATES?)

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Phone: 312-886-5745

From: Papp, Michael

Sent: Wednesday, March 01, 2017 11:33 AM

To: Ackerman, Laura <Ackerman.Laura@epa.gov>; Carlson, Albion <Carlson.Albion@epa.gov>; Hass, Andrew <hass.andrew@epa.gov>; Ross, Anthony <ross.anthony@epa.gov>; Teitz, Avraham <Teitz.Avraham@epa.gov>; Bedel, Anthony <bedel.anthony@epa.gov>; Qazzaz, Bilal <qazzaz.bilal@epa.gov>; Brown, Ethan <Brown.Ethan@epa.gov>; Hall, Chris <Hall.Christopher@epa.gov>; Compher, Michael <compher.michael@epa.gov>; Coughlin, Justin <coughlin.justin@epa.gov>; France, Danny <France.Danny@epa.gov>; Davis, Michael <Davis.Michael@epa.gov>; Crumpler, Dennis <Crumpler.Dennis@epa.gov>; Jager, Doug <Jager.Doug@epa.gov>; Clover, Fletcher <Clover.Fletcher@epa.gov>; Gaige, Elizabeth <Gaige.Elizabeth@epa.gov>; Garver, Daniel <Garver.Daniel@epa.gov>; Noah, Greg <Noah.Greg@epa.gov>; YOSHIMURA, GWEN <Yoshimura.Gwen@epa.gov>; Harris, Keith <Harris.Keith@epa.gov>; Hoyer, Marion <hoyer.marion@epa.gov>; Jackson, Clarence <Jackson.Clarence@epa.gov>; Regehr, James <Regehr.James@epa.gov>; Williams, Jennifer <Williams.Jennifer@epa.gov>; Rickard, Joshua <Rickard.Joshua@epa.gov>; Judge, Robert <Judge.Robert@epa.gov>; Allen, Kara <Allen.Kara@epa.gov>; Hence, Kia <hence.kia@epa.gov>; Biland, Larry <Biland.Larry@epa.gov>; Grooms, Leland <Grooms.Leland@epa.gov>; Limaye, Vijay <Limaye.Vijay@epa.gov>; Sena, Lorenzo <Sena.Lorenzo@epa.gov>; Hyden, Loretta <Hyden.Loretta@epa.gov>; Lehrman, Loretta <lehrman.loretta@epa.gov>; Shanis, Mark <Shanis.Mark@epa.gov>; Cuzzupe, Mary Jane <Cuzzupe.MaryJane@epa.gov>; Plate, Mathew <Plate.Mathew@epa.gov>; McCarthy, Stephanie <McCarthy.Stephanie@epa.gov>; McEvoy, Chad <mcevoy.chad@epa.gov>; Mebust, Anna <Mebust.Anna@epa.gov>; Kurpius, Meredith <Kurpius.Meredith@epa.gov>; Davis, Michael <Davis.Michael@epa.gov>; Flagg, MichaelA <Flagg.MichaelA@epa.gov>; Crowe, Mike <Crowe.Mike@epa.gov>; Miller, Michael <Miller.Michael@epa.gov>; Paguia, Monica <paguia.monica@epa.gov>; Mustafa, Mustafa <Mustafa.Mustafa@epa.gov>; Parker, Cindy <parker.cindy@epa.gov>; Kahn, Peter R. <kahn.peter@epa.gov>; Ramkissoon, Reshma <Ramkissoon.Reshma@epa.gov>; CHANG, RANDALL <Chang.Randall@epa.gov>; Regehr, James <Regehr.James@epa.gov>; Guillot, Richard <Guillot.Richard@epa.gov>; Payton, Richard <Payton.Richard@epa.gov>; Coats, Robert <Coats.Robert@epa.gov>; Sakamoto, Roseanne <Sakamoto.Roseanne@epa.gov>; Brown, Ryan <Brown.Ryan@epa.gov>; Waterson, Sara <Waterson.Sara@epa.gov>; Hamilton, Scott <hamilton.scott@epa.gov>; Ricks, Solomon <Ricks.Solomon@epa.gov>; Taylor, Catherine <taylor.catherine@epa.gov>; Bui, Thien <Bui.Thien@epa.gov>; Thompson, Alysha <Thompson.Alysha@epa.gov>; Curran, Trisha <Curran.Trisha@epa.gov>; Tufts, Jenia <Tufts.Jenia@epa.gov>; Vallano, Dena <Vallano.Dena@epa.gov>; Verhalen, Frances <verhalen.frances@epa.gov>; Zachary, Adam <zachary.adam@epa.gov>

Subject: Agenda items for next weeks QA Call

Please provide me with agenda items for the next call.

One big item that will be discussed is the issue brought up on the last Regional Office Call about the OIG alert and what to do about monitoring organizations not meeting the 1-point QC checks. After the Regional call, OAQPS and Region 4 met to discuss the South Carolina data and our suggestion was that R4 request SC invalidation of any data not meeting the 1-point QC acceptance criteria (7% precision and \pm 7% bias) as described in the SC QAPP.

In order for some level of consistency across the nation we drafted the attached memo. At present this is a draft but it reflects OAQPS position on the acceptance criteria. Ben Wells has done some evaluations and is also attached.

Also I'd like to discuss the June Meeting. Response n the dates are as follows. Based on this my suggestion in week of June 26th. I realize that with uncertainty in budgets and travel this may not come to fruition.

Regions	Date
1	either
2	June 26
3	either
4	June 26
5	either
6	either
7	either
8	
9	either
10	June 19;

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